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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Case No. 17-CR-124-ABJ
)	
GIBSON CONDIE,)	
)	
Defendant.)	

**DEFENDANT'S SECOND MOTION TO EXTEND TIME TO FILE ALL NON-
DISCOVERY PRETRIAL MOTIONS**

Defendant, Gibson Condie, by and through his attorneys, Stephen H. Kline and William B. Pilger, respectfully moves the Court for a second extension of time to file all Non-Discovery Pretrial Motions up to October 27, 2017. Counsel for the Defendant has conferred with counsel for the United States, and counsel for the United States has indicated that he does not object to the Motion. In support thereof, Defendant states as follows:

1. On July 11, 2017, the United States District Court for the District of Wyoming filed its Scheduling and Discovery Order establishing a date of September 18, 2017 for the filing of all non-discovery pretrial motions, including a bill of particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure.

2. Counsel for Defendant previously sought and received an extension of time to file any such motions up to and through October 13, 2017.
3. Counsel for the Defendant conferred with Counsel for the United States in person on today's date and counsel for the United States does not object to this Motion.
4. The Defendant is charged with 234 counts of Medicaid fraud. Discovery production is still ongoing and is extensive enough that Defendant was required to purchase a one-terabyte hard drive to store the discovery. Additional discovery has been produced as late as this week.
5. The Defendant has not had the opportunity to fully explore the appropriateness of all pretrial motions.
6. The parties are still engaged in ongoing plea negotiations, and an agreement will either be reached in the next week or the case will likely end up in trial.
7. Accordingly, the Defendant requests an extension of time of fourteen (14) days, to October 27, 2017, to file any non-discovery pretrial motions.

WHEREFORE, Defendant, Gibson Condie, by and through Counsel, respectfully requests an extension of time through October 27, 2017 to file all Non-Discovery Pretrial Motions.

DATED this 11th day of October, 2017.



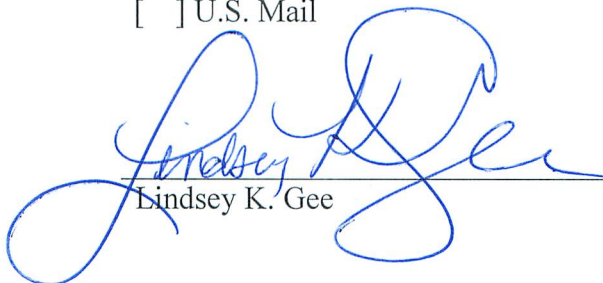
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CERTIFICATE OF SERVICE

I certify the foregoing pleading was served on this 11th day of October, 2017, and that copies were served as follows:

Eric J. Heimann
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P.O. Box 668
Cheyenne, WY 82003-0668

☒ ECF/CM
☐ E-Mail
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Lindsey K. Gee